**EXHIBIT I** 

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Applications
Letter of
Niguest 20
807,
9/10/02

September 10, 2002

Ms. Carol Monroe United States Department of Transportation Office of Hazardous Materials Regulations 400 Seventh Street, SW Washington, DC 20590

Subject: Request for Competent Authority Approval of Security Pac® Electronic Protection System "Smoke Only" ("No Tear Gas") Dye Packs

Dear Ms. Monroe:

Recently we requested of the Associate Administrator for Hazardous Materials Safety, per the guidelines of 49 CFR 173.56 (i), that our SecurityPac® Electronic Protection System "Smoke Only" ("No Tear Gas") Dye Packs be exempted from the provisions of Subchapter C, of Title 49CFR. This letter is given in response to the recommendation of Spencer Watson, Chemist, Office of Hazardous Materials Technology, that we formally request issuance of additional Competent Authority Approvals for distribution of our "Smoke Only" ("No Tear Gas") product line.

As set out in our August 19, 2002 correspondence to the Associate Administrator for Hazardous Materials Safety (copy attached), and as Dr. Ke and Mr. Watson have recently witnessed on a videotape, we have developed a new, state-of-the art, spunbonded olefin packaging system which is highly effective. Our spunbonded olefin packaging system consists of essentially three packaging components: inner, intermediate and outer packaging. The inner packaging is comprised of a 400 pound rated V3C weather resistant fiberboard box, each box of which contains one device. The intermediate packaging is comprised of a spunbonded olefin bag of not less than 0.15 mm nominal thickness, each bag of which contains one inner packaging securely sealed with a self-adhesive flap. The outer packaging is a specification 4G fiberboard box, comprised of a 200-400 pound rated V3C weather resistant material, each box of which contains not more than twelve (12) of the intermediate packagings.

The described packaging system has tremendous ability to breathe, at the same time filtering out any dye particulate in the unlikely event of a dye pack activation within the transportation system. As such, we are seeking newly assigned Competent Authority Letters and EX-Numbers for the sole purpose of packaging our SecurityPac® Electronic Protection System "Smoke Only" ("No Tear Gas") Dye Packs within our newly developed spunbonded olefin packaging system described herein.

For reference, given below is a listing of SecurityPac® Smoke Only ("No Tear Gas") Competent Authority Approvals presently in effect (original copies of which are attached hereto):

### page 2 of 2, 9/10/02 /4/4

### 3SI Security Systems Smoke Only EX Numbers (In Effect)

Security Pac® Product Description	3SI Product Drawing (Dwg.) No.	Product Classification	EX Number
SecurityPac Model MS	002-45382	1.4G	EX-8307100
FlexPac Model FS	002-45691	1.4G	EX-8307100A
ThinPac 1.0	51074938	1.4G	EX-2002060165

For reference, given below is a listing of those Security Pac® Electronic Protection System "Smoke Only" ("No Tear Gas") Dye Packs for which additional Competent Authority Approvals are sought, as pertains to the use of our highly effective spunbonded olefin packaging system. Please note in the table below that we merely changed the packaging drawing number, coincident with modifying the product description to include the use of an intermediate spunbonded olefin packaging material.

## 3SI Security Systems Smoke Only EX Numbers (Requested)

Security Pac® Product Description	3SI Packaging Dwg. No.	Product Classification	EX Number
SecurityPac Model MS, Spunbonded Olefin Packaged (*Note: Dwg. No. 51000968 supercedes Dwg. No. 002-45382)	51075012	Under Review	In Process
FlexPac Model FS, Spunbonded Olefin Packaged (*Note: Dwg. No. 51001208 supercedes Dwg. No. 002-45691)	51075012	Under Review	In Process
ThinPac 1.0, Spunbonded Olefin Packaged (Dwg. No. 51074938)	51075012	Under Review	In Process

<sup>\*</sup>Note: The superceded drawing numbers listed above were developed due to the internal requirements of purchasing and installing a new MRP computer system. The products themselves were not changed and/or altered in any manner.

#### **EXHIBIT I**



page 10g Z

Application / Cetters
of Request to DOT,
10/14/02

P.O. Box 340

1661 Juniper Creek Road

Byron, GA 31008-0340

478-956-5001

478-956-5004 Fax

www.3sisecurity.com

October 16, 2002

Department of Transportation
Associate Administrator for Hazardous Materials Safety
Research and Special Programs Administration,
7th Street, SW
Washington, DC 20590-0001

Dear Sir:

This letter is to formally request, under 49 CFR 173.56 (i), that all of our SecurityPac® Electronic Protection System "Smoke and Tear Gas" dye packs be exempted from the provisions of Subchapter C, Title 49 CFR. We are seeking newly assigned Competent Authority Letters and EX-Numbers for the sole purpose of packaging our SecurityPac® Electronic Protection System "Smoke and Tear Gas" dye packs within our newly developed, patent pending, spunbonded olefin packaging system. Coincident with this request, we respectfully request that Competent Authority Approvals be granted so as to exempt our SecurityPac® Electronic Protection System "Smoke and Tear Gas" dye packs from the provisions of the IMDG Code and ICAO Technical Instructions.

We make our request based upon the following:

- 1. We plan to ship no more than 12 units within our proven Spunbonded Olefin Packaging system. This packaging system, that is patent pending, consists of three packaging components represented by an inner, an intermediate, and an outer packaging. The inner packaging is comprised of a 400 pound rated V3C weather resistant fiberboard box, each box of which contains one device. The intermediate packaging is comprised of a spunbonded olefin bag of not less than 0.15-mm nominal thickness, each bag of which contains one inner packaging securely sealed with a self-adhesive flap. The outer packaging is a UN4G fiberboard box comprised of a 200-400 pound rated V3C weather resistant fiberboard. Batteries are never shipped within the dye packs themselves but are always packaged within a separate compartment of the packaging.
- 2. We have previously received approval to ship up to 12 SecurityPac® "Smoke Only" (No Tear Gas) dye packs as non regulated materials based upon the use of our highly effective Spunbonded Olefin Packaging configuration described above. As you will recall, Spunbonded Olefin has tremendous ability to "breathe" while also virtually retaining all of the contaminants associated with a dye pack activation within the packaging.
- 3. Concentrations of CS Tear Gas, resulting from the activation of 12 dye packs within a specially fabricated one cubic meter chamber, as measured by an independent industrial hygiene laboratory, were well below the prescribed OSHA Permissible Limit (0.05 PPM). Therefore although these devices contain CS tear gas, there is no additional risk to life, health, safety, and/or the environment within the transportation system when compared to those devices that do not contain tear gas (and have previously been approved).

To facilitate further consideration of our request, please find enclosed a video that shows the actual CS Tear Gas sampling methods and testing procedures. Also please find the following attachments:

1. "Attachment A," provides an overview of the analytical findings applicable to measured CS Tear Gas findings associated with the activation of 12 SecurityPac® "Smoke and Tear Gas" dye packs under various test conditions. (Note: The respective data sheets are attached in "Attachment E" hereto.)

Security Pac



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- 2. "Attachment B," consists of two tables. The first table provides a listing of our current EX Numbers and 3SI part numbers for SecurityPac® "Smoke and Tear Gas" dye packs. These numbers do not reflect the usage of our newly developed Spundbonded Olefin packaging. The second table lists new 3SI Part numbers for these same devices that are packaged into our Spunbonded Olefin packaging for which de-regulation and new EX Numbers are sought. Please be aware that the differences between our various dye pack models are largely cosmetic (allowing for either thinner or more flexible configurations). Consequently, the various models present little to no discernable hazard differentiation within the transportation system.
- 3. "Attachment C" are copies of our current EX Numbers and 3SI part numbers for SecurityPac® "Smoke and Tear Gas" dye packs. These numbers do not reflect the usage of our newly developed Spundbonded Olefin packaging.
- 4. "Attachment D" is a table and drawings that depicts the various elements of our spunbonded olefin packaging system.
- 5. "Attachment E" consists of the pertinent analytical data and test methods employed.

Thank you in advance for your consideration of our request. Please feel free to contact me in the event I can provide further details. I look forward to achieving de-regulation of our SecurityPac® Smoke and Tear Gas dye pack product line through the use of our newly developed, and highly effective, spunbonded olefin packaging system.

Sincerely,

Reynold J. Gobris
VP Global Operations

Cc:

Dr. Charles Ke Chief, Science Group US DOT, 400 7<sup>th</sup> St, SW Washington, DC 20590-0001 (202) 366-4495

Spencer C. Watson Chemist US DOT, 400 7<sup>th</sup> St, SW Washington, DC 20590-0001 (202) 366-8830

Richard A. Bowes
Head, Explosives Classifications and Hazards Analysis
Canada Explosives Research Laboratory
CANMET Complex
Haanel Drive
Nepean, Ontario, Canada K1R 7C5
(613) 995-0097

#### **EXHIBIT 1**



page 1 of 3, -> App 5/8/03, -> 5/ Letter

> P.O. Box 340 1661 Juniper Creek Road Byron, GA 31008-0340

478-956-5001 478-956-5004 Fax

www.3sisecurity.com

May 8, 2003

Ms. Carol Monroe
United States Department of Transportation
Office of Hazardous Materials Regulations
400 Seventh Street, SW
Washington, DC 20590

Subject: Request for Approval of Recommended Shipping Classifications: 3SI Security Systems' ThinPac® II and ThinPac® III Products

Dear Ms. Monroe:

Please find enclosed a copy of a letter prepared by Dr. C.G. Watson, Chief Inspector of Explosives, Explosives Regulatory Division, Natural Resources Canada, dated March 14, 2003, regarding recommended classifications of numerous 3SI Security Systems' (3SI) ThinPac® II and ThinPac® III products. Upon your review of this information, may I ask that you issue appropriate Letters of Competent Authority to 3SI in this regard (14 in total).

Also included as a part of this letter is a comprehensive documentation package which was provided to Mr. Richard Bowes, Head, Explosives Certifications & Hazards Analysis, Natural Resources Canada, in addition to Mr. Jean-Luc, Explosives Inspector, Explosives Regulatory Division, Natural Resources Canada, at a meeting in Ottawa on February 19, 2003.

In the event you require further details, please follow up with me at (478) 956-5001.

Your prompt attention to this matter is greatly appreciated. Thank you.

Very truly yours

Reynold Gobris

Vice-President, Global Operations

CC: Dennis Ruth, Plant Manager, 3SI

Tom Oxenfeld, Chief Executive Officer, 3SI

Security Pac



Canada

Natural Resources Ressources naturelles Canada

Oltawa, Canada K1A 0E4

March 14, 2003

File: XP2050-T26-02111502 Please refer to file # in all correspondence

Mr. Reynold J. Gobris Vice-President, Global Operations 3SI Security Systems P.O. Box 340 1661 Juniper Creek Road Byron (GA) 31008-0340

(478) 956-5001 Tel: Fax: (478) 956-5004

Internet:

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Authorization request for ThinPac II and III products RE:

Dear Sir,

Based on hie results of testing (letter X001591 revised of April 24, 2003 from the Canadian Explosives Research Laboratory to the Chief Inspector, copy to copy the ThinPac II and III products are classified according to the table enclosed with this letter.

Sincerely yours,

D.r C. G. Watson

Chief Inspector of Explosives Explosives Regulatory Division

580 Booth Street

Tel:

1 613 995 8251

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1 613 995 0480

email

cwatson@nrcan.gc.ca

cc:

Auth Circ

/cm

page 30 5/8/03 Lettu

Table - Recommended classifications on 3SI products.

	Article.	Part number	Shipping name	UN number	Division- Compatibility Group ; Subsidiary	Packing Group	Packing instruction
	ThinPac <sup>©</sup> II, Smoke Only Dye	51074977	Articles, pyrotechnic	UN 0243	1.4S	II	P135
	ThinPac <sup>O</sup> II, Smoke & Tear Gas	51074978	Tear gas candles	UN 1700	1.0 (1.9	II	P600
	ThinPac <sup>©</sup> 3, Smoke Only Dye	51075033	Articles, pyrotechnic	UN 0243	1.48	II	P135
	ThinPac <sup>©</sup> 3, Smoke & Tear Gas	51075034	Tear gas candles	UN 1700	6.1; 4.1	11	P600
1	ThinPac <sup>®</sup> II, Smoke Only Dye	51074977	-		Not Regulated*		
1	ThinPac <sup>O</sup> II, Smoke & Tear Gas	51074978			Not Regulated*	·	
1	ThinPac <sup>3</sup> 3, Smoke Only Dye	51075033	•		Not Regulated*		,
7.	ThinPaç <sup>0</sup> 3, Smoke & Tear Gas	51075034			Not Regulated*		
	ThinPac <sup>0</sup> 3, Smoke Only	51075035.	Signals, smoke	7610 NU	1.48	II	P135
	ThinPac <sup>0</sup> 3, Smoke & Tear Gas	51075036	Signale, smoke	UN 0197	1.46	II	P135
	ThinPacoli ESG, Smoke Only	51074916	Signals, smoke	7610 ND	1.45	II	P135
	ThinPac <sup>0</sup> II ESG, Smoke &	51074917	Signals, smoke	UN 0197	1.4G	II	P135
	ThinPac <sup>©</sup> 3 ESG, Smoke Only	51074920	Signals, smoke	76.LO NIU	1.45	1.1	P135 .
	ThinPac <sup>®</sup> 3 FSG, Smoke & Tear	51074921	Signals, smoke	UN 01.97	1.46	II	P135

packaging designed so that not smoke or gas escapes from the package B dated drawing 51075012 Rev. within the package ignites the event that one or more articles accidentally \* When packaged in special spunbound polyolefin 8/15/02.

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516.66H PICK / PACK Page PO No Order Date Print Date Sched Date Rep Order/WO# Cust# 00280 A 24029 11/20/2002 01/06/2003 01/06/2003 NK 2664 SPC029158 16: 15: 48: Ship from Ship to COMPUTER ENTRY XPEDX - ATLANTA 3 SI SECURITY SYSTEMS 4893 LEWIS RD JUNIPER CREEK RD STONE MOUNTAIN GA 30083 JAN 1 3 2003 BYRON GA 31008 UNITED STATES UNITED STATES OPERATOR I WAREHOUSE: 25001 Pick Batch ID: 30817 Ship Via: BESTWAY Freight Terms: DEST No. of Orders 3 1 Fgt Code (13) Hold Release: (H) 20-NOV-2002 10:03 AM : Pkg ID/ Pro # ! Pkg By : Weight Date Shipped | Carrier | Ctns 308 1C/PlQt, Bndl:Weight:Gty :Ctns ! Whse laty :Qtu 1B/6 |Line|Item (Shipped) |Ordered|To Ship|Location|

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MARK CARTONS INSTRUCTIONS:

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